

1 Zahra Billoo, State Bar No. 267634
2 COUNCIL ON AMERICAN-ISLAMIC RELATIONS (CAIR)
3 3000 Scott Blvd., Suite 101
4 Santa Clara, CA 95054
5 Telephone: (408) 986-9874
6 Facsimile: (408) 986-9875
7 Email: zbilloo@cair.com

8 Christopher Ho, State Bar No. 129845
9 Araceli Martínez-Olguín, State Bar No. 236561
10 The LEGAL AID SOCIETY –
11 EMPLOYMENT LAW CENTER
12 180 Montgomery Street, Suite 600
13 San Francisco, CA 94104
14 Telephone: (415) 864-8848
15 Facsimile: (415) 593-0096
16 Emails: cho@las-elc.org
17 araceli@las-elc.org

18 Attorneys for Plaintiff-Intervenor
19 UMME-HANI KHAN

20
21 **IN THE UNITED STATES DISTRICT COURT**
22 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

23 U.S. EQUAL EMPLOYMENT
24 OPPORTUNITY COMMISSION,

25 Plaintiff,

26 v.

27 ABERCROMBIE & FITCH STORES INC.
28 d/b/a HOLLISTER CO., HOLLISTER CO.
CALIFORNIA, LLC

Defendants.

Case No. CV 11-3162 DMR

**NOTICE OF MOTION AND
MOTION TO INTERVENE**

TO EACH PARTY AND ATTORNEY OF RECORD:

PLEASE TAKE NOTICE that the aggrieved party, UMME-HANI KHAN, hereby
moves this Court under Federal Rule of Civil Procedure 24(a)(1) for leave to intervene in the

FILED
2011 JUN 27 P 12:37
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Handwritten signature

1 above-referenced action as a party Plaintiff.

2 This motion is brought in order that Ms. Khan might assert the claims set forth in her
3 proposed Complaint in Intervention, a copy of which is attached as Exhibit A to the Declaration
4 of Araceli Martínez-Olguín in Support of the Motion to Intervene, filed concurrently herewith.
5 Further, this motion is brought on the grounds that Ms. Khan has an unconditional right to
6 intervene pursuant to Federal Rule of Civil Procedure 24(a) and 42 U.S.C. § 2000e-5(f).

7 This motion is based on this Notice, the accompanying Memorandum of Points and
8 Authorities, the Declaration of Araceli Martínez-Olguín with the attached Complaint in
9 Intervention, and the Complaint filed by the U.S. Equal Employment Opportunity Commission.

10
11
12 Dated: June 27, 2011

Respectfully submitted,

13 Zahra Billoo
14 COUNCIL ON AMERICAN-ISLAMIC
RELATIONS (CAIR)

15 Christopher Ho
16 Araceli Martínez-Olguín
17 The LEGAL AID SOCIETY –
EMPLOYMENT LAW CENTER

18
19 By:


ARACELI MARTÍNEZ-OLGUÍN